

ORIGINAL

BRODIE, J.

POLLAK, M.J.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORKSulaiman M. Songee

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

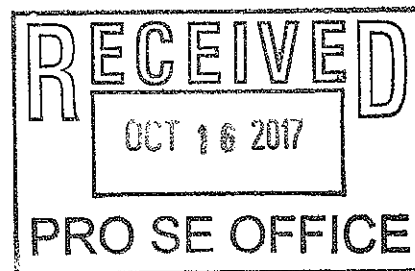
County of Hennepin
Minnesota

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. **CV 17-6103**

(to be filled in by the Clerk's Office)

Jury Trial: ☐ Yes ☐ No
(check one)

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Sulaiman M. Songa</u>
Street Address	<u>337 Palmetto Street</u>
City and County	<u>Brooklyn, Kings County</u>
State and Zip Code	<u>New York, 11237</u>
Telephone Number	<u>929-365-5406</u>
E-mail Address	<u>SulaimanSonga@aol.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Hennepin County</u>
Job or Title (if known)	<u>Minnesota</u>
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

Defendant No. 2

Name	
Job or Title (if known)	
Street Address	
City and County	

State and Zip Code _____
 Telephone Number _____
 E-mail Address _____
 (if known)

Defendant No. 3

Name _____
 Job or Title _____
 (if known)
 Street Address _____
 City and County _____
 State and Zip Code _____
 Telephone Number _____
 E-mail Address _____
 (if known)

Defendant No. 4

Name _____
 Job or Title _____
 (if known)
 Street Address _____
 City and County _____
 State and Zip Code _____
 Telephone Number _____
 E-mail Address _____
 (if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (*name*) _____, is a citizen of the State of (*name*) _____.

b. If the plaintiff is a corporation

The plaintiff, (*name*) Hennepin County, is incorporated under the laws of the State of (*name*) Minnesota, and has its principal place of business in the State of (*name*) Minnesota.

(*If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.*)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (*name*) _____, is a citizen of the State of (*name*) _____. Or is a citizen of (*foreign nation*) _____.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* _____, is a citizen of the State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* Hennepin County, is incorporated under the laws of the State of *(name)* Minnesota, and has its principal place of business in the State of *(name)* Minnesota.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The beginning was at the age of 12. Foster Care & Child Protection were involved in a dispute between my supposed mother & I. I was uprooted & placed in foster homes. Tracks of deportation & charges were filed. We, my mother & I never reconnected or ~~reconciled~~ reconciled our relationship. The next 9 years, up until twenty one, were

↓
(Back)

Years of hardship, and every day came and went with the overall feeling that I'm being manipulated. Still, I continue, with the hope that one day I will get the answers. I had questions about my supposed mother, whom I was told would be deported if we reunited. I was told she was in the United States illegally and they were considering deportation. I was also told that my father, a United States resident, at the time of my birth was also deported. I know I was born in Africa, but after I was uprooted, the particulars, how I ended with my supposed biological family in Africa, when my mother and father were in the united states, were missing. An ambiguous lifestyle was structured and a perspective was created. That began 9 years through the worm hole.

At age twenty-one, a ray of hope. My daughter was born. She became an extension of life, a reason to continue. Because of her, I started working actively to improve all my artistic abilities. I needed money, I needed a career. Writing music came easier than writing novels. I was still maturing. I pursued music as a career path. It was around that time of life when I realized how dangerous it could be for someone who is resented. The years

up until 26 were chaotic. Associates became rivals, friends became enemies, safety was in question, I felt targeted.

I left Minnesota in 2010, with an intension to never return. That was second attempt to leave the state. The first attempt was in 2007, but I returned because the mother of my daughter, plead. She felt threatened, and warning signals were apparent. We fought to save our daughter, yet we were divided during the process. After the situation was stabilized, I left for New York, and she, my daughter, was to join me after six months.

After I was in New York, I was told I was wanted in Minnesota for robbing a former roommate. I returned to Minnesota in September of 2010. A second case, in three years was framed, but this time, they had witnesses. I was officially charged, as opposed to the first situation, when I was just questioned. This time, it was my former roommate, an investigating officer, a state worker, and a prosecutor, versus me and a public defender. I was mascot through the entire trial, which took three days. I was state provided tarred garments and mocked. The courtroom was empty. I was convicted simply because a former roommate accused me. What is there for an orphan do? Continue. Grow stronger. I picked up a pen and my focus

became developing my ability as a writer. In prison, I took courses and after 18 months of my incarceration, I transferred to a local college to not only continue toward a bachelor, but to also set myself on a path to publication. I excelled on all levels. With my daughter in Atlanta, a move that took place after my incarceration. I told my Baby mother to move to Atlanta and wait for me. During college, I made it clear that my intension was to relocate to New York after graduation. When my college path was interfered with, just this year, I was left with no show but to pursue a lawsuit against Minnesota. The county of Hennepin forced me out of my supposed mother home, then in my latter years, the county sought my destruction.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

*At this point money hasn't crossed my mind.
At this point, to restore my life as it should be
would be a great step in the right direction.*

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 10/16, 2017.

Signature of Plaintiff

Printed Name of Plaintiff

[Handwritten Signature]
Sulaiman Songa